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Interim Co-Lead Counsel for Plaintiff Class

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

**IN RE: HIGH-TECH EMPLOYEE
ANTITRUST LITIGATION**

THIS DOCUMENT RELATES TO:

All Actions

Master Docket No. 11-CV-2509-LHK

**PLAINTIFFS' ADMINISTRATIVE MOTION
TO FILE UNDER SEAL LETTER RE
CORRECTION TO: CONSOLIDATED
REPLY IN SUPPORT OF MOTION FOR
CLASS CERTIFICATION AND IN
OPPOSITION TO DEFENDANTS' MOTION
TO STRIKE THE REPORT OF
DR. EDWARD E. LEAMER; AND REPLY
EXPERT REPORT OF EDWARD E.
LEAMER, PH.D.**

Date: January 17, 2013
Time: 1:30 p.m.
Courtroom: 8, 4th Floor
Judge: Honorable Lucy H. Koh

Pursuant to Civil Local Rule 79-5, Plaintiffs, by and through their counsel, respectfully submit this administrative motion for an order permitting them to file under seal a letter regarding

a correction to Plaintiffs' Consolidated Reply in support of Motion for Class Certification and in Opposition to Defendants' Motion to Strike the Report of Dr. Edward E. Leamer, and the Reply Expert Report of Edward E. Leamer, Ph.D. ("Letter").

Plaintiffs request that the Letter be filed under seal because it refers to data that Defendants have designated “CONFIDENTIAL – ATTORNEYS’ EYES ONLY” under the Stipulated Protective Order (Modified by the Court) (Dkt. No. 107).

Pursuant to Judge Koh's Civil Standing Order Regarding Motions to File Under Seal, Plaintiffs have publicly e-filed a proposed public redacted version of the Letter. Furthermore, Plaintiffs will lodge with the Court an unredacted copy of the Letter in accordance with Civil Local Rule 79-5 and General Order 62.

Plaintiffs take no position on whether the designated data satisfy the requirements for sealing. Although Plaintiffs' request is narrowly tailored to include only the information that may require confidentiality, Defendants must show good cause for sealing the data they have placed a confidentiality designation upon by submitting a declaration and proposed order within seven days after the lodging of the designated documents. *See Civil Local Rule 79-5(d).*

Dated: December 12, 2012

Respectfully Submitted,

By: /s/ *Brendan Glackin*

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